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Attorneys for Defendant
General Motors LLC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

RUDOLFO FIDEL MENDOZA,
individually and on behalf of a class of
similarly situated individuals,

Plaintiff,

vs.

GENERAL MOTORS LLC,

Defendant.

Case No. CV 10-2683 AHM (VBKx)

**STIPULATION TO MODIFY
BRIEFING SCHEDULE FOR
DEFENDANT'S MOTION TO
DISMISS FOR LACK OF
JURISDICTION OR,
ALTERNATIVELY, FOR
TRANSFER TO THE SOUTHERN
DISTRICT OF NEW YORK FOR
REFERRAL TO THE
BANKRUPTCY COURT**

Hearing Date: October 18, 2010
Time: 10:00 a.m.
Courtroom 14
Honorable A. Howard Matz

Plaintiff Rodolfo Fidel Mendoza ("Plaintiff") and General Motors, LLC
("GM"), through their undersigned counsel, hereby stipulate and agree as follows:

WHEREAS, Plaintiff served a Class Action Complaint ("complaint") in the
matter captioned *Mendoza et al. v. General Motors, LLC* (Case No. CV-10-2683
AHM (VBK)) on GM on or about May 1, 2010;

WHEREAS, the Court entered a June 18, 2010 Order Re: Filing of Plaintiff's
First Amended Class Action Complaint and Defendant's Response (Docket No.
12), setting and/or extending the dates for:

1. filing of Plaintiff's First Amended Class Action Complaint, by July 16, 2010;
2. filing of GM's motion to dismiss the complaint, or, in the alternative, transfer this action to the United States District Court for the Southern District of New York pursuant to 28 U.S.C. § 1412, by August 16, 2010,
3. filing of Plaintiff's Opposition to GM's motion, by September 7, 2010;
4. filing of GM's Reply in support of its motion, by September 20, 2010; and
5. the hearing on GM's motion, for September 27, 2010 , at 10:00 a.m., Courtroom 14, in the Central District of California, Western Division.

WHEREAS, Plaintiff filed his First Amended Class Action Complaint on July 15, 2010;

WHEREAS, GM filed its Motion to Dismiss for Lack of Jurisdiction or, Alternatively, for Transfer to the Southern District of New York for Referral to the Bankruptcy Court (Docket No. 15) ("Motion to Dismiss or Transfer") on August 13, 2010;

WHEREAS, the parties at the request of plaintiff's counsel stipulated to and the Court approved two prior extensions of plaintiff's time to file opposition to the Motion to Dismiss or Transfer;

WHEREAS, plaintiff filed his opposition to the Motion to Dismiss or Transfer on September 27, 2010;

WHEREAS, GM's reply to plaintiff's opposition is presently due next Monday, October 4, 2010 and the hearing is set for October 18, 2010;

WHEREAS, due to the press of other professions and personal commitments GM counsel has requested, and plaintiff's counsel has agreed to stipulate to, a one-week extension of GM's time to file its reply, and no previous extensions of this deadline have been granted;

1 WHEREAS, the Court, in its Order of August 23, 2010 approving plaintiff's
2 first request for an extension originally gave GM two weeks to prepare its reply,

3 IT IS HEREBY STIPULATED AND AGREED, by and between plaintiff
4 and defendant GM, through their respective counsel of record, that the Court,
5 subject to the convenience of its calendar, may enter an order as follows:

6 1. Defendant will file its reply in support of its motion by October 11, 2010;
7 and

8 2. The hearing the Motion to Dismiss or Transfer may be continued to
9 October 25, 2010, at 10:00 a.m., Courtroom 14, in the Central District of
10 California, Western Division, or another date convenient to the Court's
11 calendar;

12 DATED: September 29, 2010 ISAACS CLOUSE CROSE & OXFORD LLP
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14 By: [s]
15 Gregory R. Oxford
16 Attorneys for Defendant
General Motors LLC

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18 DATED: September 29, 2010 THE LAW OFFICE OF ROBERT L. STARR
19 STRATEGIC LEGAL PRACTICES APC

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21 By: [s]
22 Payem Shahian
23 Attorneys for Plaintiff
24 Rodolfo Fidel Mendoza
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**[PROPOSED] ORDER
EXTENDING BRIEFING AND
HEARING SCHEDULE FOR
DEFENDANT'S MOTION TO
DISMISS FOR LACK OF
JURISDICTION OR,
ALTERNATIVELY, FOR
TRANSFER TO THE SOUTHERN
DISTRICT OF NEW YORK FOR
REFERRAL TO THE
BANKRUPTCY COURT**

Hearing Date: October 18, 2010
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Courtroom 14
Honorable A. Howard Matz

The Court has reviewed and considered the parties' September 29, 2010 Stipulation to Extend Briefing and Hearing Schedule for Defendant's Motion to Dismiss for Lack of Jurisdiction or, Alternatively, for Transfer to the Southern District of New York for Referral to the Bankruptcy Court ("Stipulation"). Based on the Stipulation and GOOD CAUSE APPEARING, it is hereby ordered that:

1. Defendant will file its reply in support of its motion by October 11, 2010;

1 2. The hearing on Defendant's motion shall be continued to October 25, 2010,
2 at 10:00 a.m., Courtroom 14, in the Central District of California, Western
3 Division.

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5 DATED: September __, 2010

6 United States District Judge
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